#### 5.20 CUMULATIVE IMPACTS

#### 5.20.1 Introduction

The cumulative impacts assessment for the El Segundo Power Redevelopment (ESPR) Project is based on the California Environmental Quality Act (CEQA) (Cal. Public Resources Code [PRC] §21083) and the *CEQA Guidelines* (California Code of Regulations [CCR] §15130) which requires that the discussion of cumulative impacts be "guided by the standards of practicality and reasonableness" [PRC §21083(b)]; and, that "the discussion include a list of past, present, and reasonably anticipated future projects producing related or cumulative impacts" [CCR §15130(b)(1) (A)]. The *CEQA Guidelines* require that cumulative impacts be discussed when they are significant, and that the discussions of cumulative impacts reflect the severity of the impacts and their likelihood of occurrence. However, the *Guidelines* state that the discussion need not provide the impacts discussion in as great of detail as is provided for the project's impacts.

Therefore, the purpose of this section of the AFC is to:

- 1) Identify past, present, and reasonably foreseeable actions in the project area that could affect the same resource(s) as the ESPR project;
- 2) Determine if the impacts of the ESPR project and the other actions would overlap in time or geographic extent;
- 3) Determine if the impacts of the proposed project would interact with, or intensify, the impacts of the other actions; and
- 4) Identify any potentially significant cumulative impacts.

The ESPR project includes the redevelopment of the existing generating station and addition of new ancillary facilities (i.e. water supply lines, aqueous ammonia line, and sanitary sewer line). The ancillary facilities are primarily linear in nature. Where potentially significant impacts have been identified, an assessment of cumulative impacts is provided in the respective resource section(s) of this AFC.

The project will be constructed at the El Segundo Generating Station (ESGS), an existing power plant operated by NRG Development Company, Inc. The ESGS is located at 301 Vista Del Mar Boulevard in El Segundo, California, situated approximately 2.5 miles southwest of the Los Angeles International Airport and west of the San Diego Freeway on the eastern shore of the Santa Monica Bay. The plant's linear facilities will extend from the plant in the following manner:

- Water Supply Lines (Route 1): 1.85 miles north, then northeast
- Sanitary Sewer Line (Route 3): 150 feet southward
- Aqueous Ammonia Line (Route 3): 0.7 miles eastward.

Projects that will potentially contribute to cumulative impacts are those located in the same general geographic area of influence as the ESPR project. For this cumulative assessment, the area of influence is defined as the area within: a 5-mile radius of the power plant or 1 mile of its associated linear facilities. Projects or proposed projects of potential regional significance are also considered in the cumulative analysis. Information was gathered on projects that either: 1) are greater than 30,000 square feet; 2) have submitted an application for required approvals and permits; 3) have been previously approved and may be implemented in the near future; or 4) are contemplated and reasonably anticipated, but have not been formally proposed. The following assessment focuses on the potential overlap of construction and operation impacts among various projects.

Information concerning potential future projects needed for the cumulative impact assessment was primarily obtained via personal communications. Information available via the Internet was also reviewed. Information was provided by the City of El Segundo Community Development Department, Manhattan Beach Planning Department, City of Torrance Planning Department, City of Los Angeles Planning Department, City of Hermosa Beach Planning Department, City of Hawthorne Planning Department, and the City of Redondo Beach Planning Department.

Potential cumulative impacts were identified if the ESPR project impacts would contribute to the impacts of reasonably anticipated future projects under construction at the same time. The magnitude of such cumulative impacts is dependent, in part, on the extent of construction overlap in time and geographic area. For the purposes of this cumulative impact assessment, it is anticipated that the demolition and construction phase for the ESPR project will overlap with other projects. This assessment also considers potential cumulative impacts that could occur during the operational phase of the ESPR project. No long-term, unmitigable significant adverse impacts due to project operation have been identified.

### **5.20.2** Cumulative Impacts Analysis

Table 5.21-1 presents a list of potential projects considered in this cumulative impact assessment. The time frames for these potential developments are also indicated. The future land uses that have been identified are described below. Figure 5.20-1, Location of Projects

TABLE 5.20-1
EL SEGUNDO POWER REDEVELOPMENT PROJECT CUMULATIVE PROJECTS LIST

Project Name/Lead Agency	Project Description	Status/Timing	Location
Los Angeles International Airport Draft Master Plan – City of Los Angeles, Federal Aviation Administration	Airport expansion that involves runway reconfigurations and expansion, roadway improvements, construction of new offices, structures, parking facilities, and land acquisitions.	An EIR/EIS is currently being prepared for the project. The document is expected to be released for public review within the next 6 months. It is uncertain when the project would be approved and when construction would begin.	West of San Diego Freeway Interstate 405, south of Manchester Boulevard, and north of Imperial Highway (I-105)
Continental City Project - City of Los Angeles	Los Angeles International Airport project for development of office and retail buildings	Approved subdivision entitlement, development agreement, and Final EIR. Construction could begin Jan 2002	East of Aviation Blvd., between 111 <sup>th</sup> Street and Imperial Highway located within Westchester-Playa del Rey District Plan
Los Angeles International Airport Northside Project – City of Los Angeles	A Los Angeles International Airport project that includes the development of commercial, recreational, airport-related, and industrial land uses at the northside area of LAX.	Final EIR has been approved. Construction could begin Jan 2002.	Northside of LAX, north and south of Westchester Parkway, between Pershing Dr. and Sepulveda Blvd.
EA #50 – City of El Segundo	Construction of new commercial, light industrial, and restaurant space.	Pending approval, construction plans are not available.	
Widening of Aviation Boulevard – City of El Segundo	Widening of Aviation Boulevard between Rosecrans Boulevard and Imperial Highway	Construction is anticipated to begin in December 2002 and end in December 2003.	Aviation Boulevard between Rosecrans Boulevard and Imperial Highway
Hotel/Office – City of El Segundo	New 300 room hotel and 121,000 square foot commercial building.	Pending approval, construction plans are not available.	888 North Sepulveda, El Segundo

# TABLE 5.20 (CONTINUED)

Project Name/Lead Agency	Project Description	Status/Timing	Location
Remax Building – City of Manhattan Beach	Demolition of existing buildings and construction of 56,000 sq. ft. of new office buildings	A negative declaration was prepared and approved by Planning Commission. The project is in appeal and will be heard before the City Council in late November 2000. Construction could begin February 2001.	330 North Sepulveda Boulevard
Hawthorne Ocean Gate Redevelopment Project – City of Hawthorne	Construction of 85,000 sq. ft. of office development and 100,000 sq. ft. of retail.	Construction of the retail space has been completed. No building plans for the office development have been submitted. It is anticipated that construction could occur within the next 3 to 6 years.	Southwest corner of Rosecrans Ave and Ocean Gate Avenue.
Hawthorne Airport– City of Hawthorne	Airport Improvements	A master plan has been approved and the City of Hawthorne has an exclusive right to negotiate future development within the project area. Construction and building plans have not been submitted.	I-105 and between Prairie Avenue and Crenshaw Boulevard
Former Data General Building – City of Manhattan Beach	Addition of 62,000 sq. ft. to an existing 123,000 sq. ft. office building.	An EIR was approved in the 1980's. The Developer has recently been granted a three-year extension. It is unknown when construction would begin.	1500 Rosecrans Boulevard
Mar Ventures – City of Hawthorne	Development of two hotels.	One hotel is currently under construction and should be completed by 2001. Construction of the other hotel should be completed by late 2001.	14500 Aviation Boulevard

# TABLE 5.20 (CONTINUED)

Project Name/Lead Agency	Project Description	Status/Timing	Location
Hawthorne Gateway Redevelopment Project – City of Hawthorne  • Auto Nation USA  • Avres Group Hotel  • Proposed Retail	Construction of Auto Nation USA; 6-story hotel, 3,040 sq. ft. restaurant; and proposed retail.	Construction of the Auto Nation USA should be completed within 2001. No construction plans have been submitted to the City; however, the City anticipates that construction would be completed by 2002.	Southeast corner of Rosecrans Avenue and Hindry Avenue.
Offices – El Segundo	290, 096 sq. feet of commercial office space	In plan check; Development Agreement 6/9/02; No construction plan available	2301 Rosecrans, El Segundo
Residential – City of Hawthorne	Construction of 44 detached homes on 123,436 sq ft. lot and 12 units on 48,000 sq. ft. lot.	Building plans have not been submitted and a construction schedule is not available.	14422 Lemoli Avenue; 115 <sup>th</sup> Street between Sundale Avenue and Inglewood Boulevard.
Expo Design Center (Home Depot)  – City of Redondo Beach	Construction of 97,723 sq. ft. of commercial/retail space.	The EIR has been approved and the project is in plan check. Construction is estimated to begin within the next six months.	1516 Hawthorne Boulevard
Playa Vista – City of Los Angeles	Construction of residential, office and commercial space, entertainment, new media and technology campus, and wetland restoration and wildlife preserve on a 1,087 acre site	Phase One will be completed by early 2001. An EIR is being written for Phase Two and should be out for public review early 2001. It is uncertain when construction of Phase Two would begin.	South of Marina Del Rey, three miles from east to west, starting almost at Pacific Ocean and bordered by Westchester Bluffs.

Considered in the Cumulative Impacts Assessment, illustrates the general geographical locations of these projects.

# 5.20.2.1 Los Angeles International Airport Draft Master Plan

The Draft Master Plan for Los Angeles International Airport proposes to change runways, passenger terminals, roadways, cargo and other facilities. A Draft Environmental Impact Statement/Environmental Impact Report (DEIS/EIR) is being prepared for the Master Plan Project and is a joint effort between the Federal Aviation Administration and the City of Los Angeles. The project would also include the following transportation improvement projects in the vicinity of the airport:

- State Route 1: realignment of SR 1, north of Los Angeles International Airport between Sepulveda Boulevard and Lincoln Boulevard.
- Los Angeles International Airport Expressway: construction of an expressway along side of I-405.

Construction of the project would be phased (depending on the approved build alternative) and would begin immediately upon approval of the project and conclude in 2015. The Draft Master Plan is currently being prepared and is anticipated to be released for public review within the next 6 months. If the Los Angeles International Airport project is approved by the end of 2001, construction could begin by early 2002 and could potentially overlap with the ESPR project; however, given the magnitude and controversial nature of the Los Angeles International Airport project, the schedule for completion of the EIR/EIS, and subsequent construction activities is considered speculative. Thus, there are no reasonably foreseeable cumulative impacts associated with this project.

# 5.20.2.2 <u>Continental City Project</u>

The Los Angeles International Airport has an approved subdivision entitlement, development agreement, and Final EIR to allow for the construction of the 28.5-acre Continental City project located east of Aviation Boulevard, between 111<sup>th</sup> Street and Imperial Highway. The project includes the development of 3 million square feet (MSF) of office space and 100,000 square feet of retail space. Construction could begin as early as 2002.

Construction of the project has the potential to overlap with the ESPR project construction. The construction truck traffic increase associated with the proposed projects and the Los Angeles International Airport Continental City project may impact traffic and transportation temporarily

along major regional routes, such as I-405 and I-105. In addition, concurrent construction of the projects could temporarily deplete certain types of trade labor and equipment. Both projects would increase short-term emissions of air pollutants associated with concurrent construction activities. Additional construction activity occurring in the vicinity of Los Angeles International Airport would increase emissions beyond already significant levels.

# 5.20.2.3 Los Angeles International Airport Northside Project

The Los Angeles International Airport LAX Northside project consists of the development of 4.5 MSF of airport-related industrial and commercial uses on 320 acres of vacant land. The project area is on airport property located north of Los Angeles International Airport, north and south of Westchester Parkway, between Pershing Drive and Sepulveda Boulevard. The project consists of two major development areas: Westchester Center, comprising of 2.1 MSF of office space, restaurant, and retail on 69 acres; and Business Park, comprising of 2.4 MSF of office, research park, airport support facilities, restaurant, retail, and hotel on 170 acres. Approvals include: Final EIR, zoning ordinances, and final tract map. Construction could begin as early as 2002.

Construction of the project has the potential to overlap with the ESPR project construction. The construction truck traffic increase associated with the proposed project and the LAX Northside Project may impact traffic and transportation temporarily along major regional routes, such as I-405 and I-105. In addition, concurrent construction of the projects could temporarily deplete certain types of trade labor and equipment. Both projects would increase short-term emissions of air pollutants associated with concurrent construction activities. Additional construction activity occurring in the vicinity of LAX would increase emissions beyond already significant levels.

#### **5.20.2.4** Offices on 2301 Rosecrans Avenue, EA# 206411

The project consists of the development of 290,096 square feet of office space in the City of El Segundo. The project is currently in plan check and a construction schedule is not yet available. Since there are no construction schedules or plans to consider for a cumulative impact analysis, it is not feasible to assess the cumulative significance of the project with the construction or operation of the proposed plant. Even if the construction schedules of the two projects were to overlap, impacts would not be considered significant due to the geographical locations of the two projects.

## 5.20.2.5 <u>EA# 530, City of El Segundo</u>

The project consists of the development of 210,450 square feet of office, light industrial, and restaurant space in the City of El Segundo. The project is currently pending approval and a construction schedule is not yet available (City of El Segundo, 2000). Since there are no construction schedules or plans to consider for a cumulative impact analysis, it is not feasible to assess the cumulative significance of the project with the construction or operation of the proposed plant. Even if the construction schedules of the two projects were to overlap, impacts would not be considered significant due to the geographical locations of the two projects.

# 5.20.2.6 <u>Hotel/Office, City of El Segundo</u>

The project consists of the development of a 300-room hotel and 121,000 square feet of office space in the City of El Segundo. The project is currently pending approval and a construction schedule is not yet available (City of El Segundo, 2000). Since there are no construction schedules or plans to consider for a cumulative impact analysis, it is not feasible to assess the cumulative significance of the project with the construction or operation of the proposed plant. Even if the construction schedules of the two projects were to overlap, impacts would not be considered significant due to the geographical locations of the two projects.

#### 5.20.2.7 Widening of Aviation Boulevard

The City of El Segundo Public Works Department is proposing the widening of Aviation Boulevard between Rosecrans Avenue and Imperial Highway (I-105). It is anticipated that construction of the project would begin in December 2002 and be completed by December 2003 (City of El Segundo, 2000). Construction of the project would overlap with construction of the ESPR project during the fourth quarter of 2002. The construction truck traffic increase associated with the project and the ESPR project could potentially impact local traffic in the City of El Segundo. Impacts are not considered significant since all construction worker and truck trips for ESPR project access the site from I- 405 and I-105 to Vista Del Mar, and would avoid Aviation Boulevard.

#### 5.20.2.8 Remax Office Building

The project consists of the demolition of the existing buildings and the construction of 56,000 square feet of new office buildings at 330 S. Sepulveda in the City of Manhattan Beach. A Negative Declaration was prepared for the project and approved by the Planning Commission. The project is scheduled to be heard before the City Council in late November 2000 and construction of the project is anticipated to begin as early as February 2001 (City of Manhattan

Beach, 2000). Construction of the project is likely to be completed before construction of the ESPR project begins.

The project would be located approximately 2.5 mile south of the ESGS. Due to the respective geographical locations of the two projects and different construction schedules, their potential environmental impacts are not significant relative to each other.

# 5.20.2.9 Former Data General Building Project

The project consists of the addition of 62,000 square foot to an existing office building located at 1500 Rosecrans Avenue in the City of Manhattan Beach. An EIR was performed for the project in the 1980s. No activity has occurred since approval in the 1980s (City of Manhattan Beach, 2000). The developer has recently applied for a three-year extension on the project; however, it is uncertain when construction would begin on the project. Due to the uncertainty of construction of this project, it is not feasible at this time to assess the level of cumulative significance associated with the construction and operation of the proposed power plant project.

#### **5.20.2.10** Expo Design Center (Home Depot)

The project consists of the construction of 93,723 square foot commercial and retail building at 1516 Hawthorne Boulevard in the City of Redondo Beach. An EIR was written for the project and approved by the planning commission. Currently the project is in plan check and construction could begin within the next six months. It is likely that construction of the project would be completed prior to construction of the ESPR project. The project is over 4.5 miles southeast of the ESGS site. Due to the respective geographical locations of the two projects and different construction schedules, their potential environmental impacts are not considered significant relative to each other.

#### 5.20.2.11 Playa Vista Development

The project consists of the development of residential, office and commercial space, entertainment, new media and technology campus, restoration of wetlands, and a wildlife preserve on a 1,087 acre site south of Marina del Rey, almost three miles east to west, starting almost at the Pacific Ocean bordered on the south by the Westchester Bluffs. The project involves two phases of development.

Construction of Phase One is currently underway and will be ready for opening in early to mid 2001 (Kelly, 2000). Some areas of the project have already opened. The EIR for Phase Two is currently being prepared and could be ready for public review in early 2001. Construction of

Phase Two is not anticipated to begin for at least two to three years and would only occur in areas outside of the coastal zone. Construction of areas within the coastal zone is not anticipated to begin for at least 5-6 years due to coastal development permit requirements (Kelly, 2000). At this time it is not known when Phase Two would be ready for opening. The project includes several features to mitigate restoration of Bellona Wetlands and traffic improvements. To further help ease the flow of traffic on nearby arteries, Playa Vista will undertake several traffic improvements on Lincoln Boulevard, Jefferson Boulevard, Sepulveda Boulevard, Centinela Avenue, and Culver Boulevard, Marina Freeway, and at 77 intersections during Phase One (Playa Vista, 2000). Over \$97 million will be spent to mitigate the project's traffic impacts and improve current traffic conditions.

Phase One of the project should be completed prior to construction of the ESPR project. No impacts are anticipated from construction and operation of Phase One and the ESPR project. If the EIR for Phase Two is approved by the end of 2001, construction could begin by early 2002 and could potentially overlap with the ESPR; however, given the magnitude and controversial nature of the project, the schedule for completion of the EIR/EIS, pending lawsuits, and subsequent construction activities is considered speculative. Thus, there are no reasonably foreseeable cumulative impacts associated with this project.

### 5.20.2.12 <u>Hawthorne Gateway Redevelopment Project- Environmental Impact Report</u>

- **Auto Nation USA (5175 Marine Avenue).** The City has approved the project and building plans have been submitted to the Building Department. Construction of the project is anticipated to begin in early 2001 and should be completed within the year (Ramirez, 2000). Construction of the project will not overlap with construction of the ESPR project.
- Avres Group Hotel (southwest corner of Rosecrans and Hindry Avenue). The Planning Commission approved 2000CUO4 on February 2, 2000 for a six-story 254 room full-service hotel to be located on the southeast corner of Rosecrans and Hindry Avenue. The proposal also includes a 3,040 square foot restaurant. Building plans have not yet been submitted and a construction schedule is not available. If construction occurs within 2001, it is likely that it would be completed prior to 2002 (Ramirez, 2000). Due to the uncertainty of construction of this project, it is not feasible at this time to assess the level of cumulative significance associated with the construction and operation of the proposed power plant project.
- **Proposed Retail.** The project involves the development for retail, Staples store, and McDonalds drive-through restaurant. Plans for the retail uses have not been submitted. Staples and McDonalds have submitted plans for the building; however, a construction

schedule is not yet available for these projects. Due to the uncertainty of construction of this project, it is not feasible at this time to assess the level of cumulative significance associated with the construction and operation of the proposed power plant project.

# 5.20.2.13 Mar Ventures

The project consists of the development of two hotels (Spring Hill Suites and Marriot Town Place Suites Hotel) at 14500 Aviation Boulevard. The Spring Hill Suites is currently under construction should be completed by 2001. Construction of the Marriot Town Place Suites Hotel is anticipated begin in early 2001 and should be completed by late 2001 (Ramirez, 2000). Due to the respective geographical locations of the two projects and different construction schedules, their potential environmental impacts are not considered significant relative to each other.

#### 5.20.2.14 Residential

The project consists of two residential projects in the City of Hawthorne. Planned Unit Development 99-01-Tract 52834 involves the construction of 44 detached homes on a 123,436 square foot lot located at 14422 Lemoli Avenue. A negative declaration was prepared and approved for the project. Building plans have not been submitted and a construction schedule is not available (Ramirez, 2000).

Planned Unit Development 99-03 involves the construction of 12 detached units on a 48,000 square foot lot on 115<sup>th</sup> Street, between Sundale Avenue and Inglewood Avenue. Building plans have not been submitted and a construction schedule is not available (Ramirez, 2000).

Due to the uncertainty of construction of the two projects, it is not feasible at this time to assess the level of cumulative significance associated with the construction and operation of the proposed power plant project.

#### 5.20.2.15 Hawthorne Airport

A Master Plan has been approved and the City of Hawthorne has an exclusive right to negotiate future development within the project area. No other information is available at this time (City of Hawthorne, 2000). Due to the uncertainty of project construction it is not feasible at this time to assess the level of cumulative significance associated with the construction and operation of the proposed power plant project.

## 5.20.2.16 Hawthorne Ocean Gate Redevelopment Project

The City of Hawthorne Redevelopment Agency approved the development of the site on the southwest corner of Rosecrans Avenue and Ocean Gate Avenue. An EIR has been approved for the construction of 850,000 square feet of office development, up to an additional 100,000 square feet of retail development for approximately 3,360 vehicles (City of Hawthorne, 2000). Construction of the retail space has been completed. Building plans for construction of the office buildings have not been submitted. However, the City anticipates that construction will be done within the next three to six years (Ramirez, 2000).

Construction of the office buildings has the potential to overlap with construction of the ESPR project. However, due to the uncertainty of construction of the project, it is not feasible at this time to assess the level of cumulative significance associated with the construction and operation of the proposed power plant project.

# **5.20.2.17** Other Proposed Power Plants

To ensure that potential cumulative impacts of the Project and other nearby projects are adequately considered, a cumulative impacts analysis will be conducted in accordance with the protocol included as Appendix I.7. In addition, CEC information regarding the three additional power plants in Los Angeles County was reviewed. These facilities include the proposed 550 megawatt (MW) Nueva Azalea Plant Project (formerly called the Sunlaw Cogeneration), the 700 MW AES Redondo Beach Project, and the proposed 500 MW Enron Long Beach District Energy Facility Project. The CEC has received an Application For Certification (AFC) for the Nueva Azalea project. The Nueva Azalea project is located in the City of South Gate, approximately 20 miles east of the ESPR project site. AFCs for the AES Redondo Beach Project and Enron Long Beach District Energy Facility project have not been submitted. In addition, the Scattergood Generating Station, owned and operated by the Los Angeles Department of Water and Power (LADWP), and located approximately one mile north of the ESGS, is contemplating certain upgrade projects. Regionally and cumulatively, the resource areas that require cumulative analysis regarding these projects are air quality and socioeconomics.

The primary cumulative impacts potentially associated with the development and operation of the projects discussed above will be caused by overlapping construction schedules. Concurrent construction of the projects could temporarily deplete certain types of trade labor and equipment.

Review of CEC project information on the Internet provided construction/operation schedule information for the proposed Nueva Azalea Power Project. No information was available for

the AES Redondo Beach Project and Enron Long Beach District Energy Facility Project. The applicant for the Nueva Azalea Power Project plans to complete construction and start operation of the combined cycle unit in the second quarter of 2003 (California Energy Commission, 2000). Construction is estimated to occur over a 20-month period. Construction of the Nueva Azalea Power Project may overlap with construction of the ESPR project. However, as indicated in Section 5.10 Socioeconomics, Table 5.10-6, there is a large supply of construction workers/laborers within the Los Angeles County. Therefore, there will not be a significant cumulative impact to trade labor or equipment during construction of the proposed plant.

#### **5.20.2.18** Conclusion

The ESPR project and identified cumulative projects would result in incremental cumulative impacts to land use, air quality, noise, and traffic during the construction period. Noise and land use impacts are not considered significant due to the temporary nature of the construction.

Construction traffic from construction of ESPR project could generate additional surface traffic on the same haul routes at the same time as construction of future Los Angeles International Airport-related projects. It is likely that that these projects will share haul routes, such as I-405, I-105, and Sepulveda Boulevard.

Probable future projects that occur within the similar construction time frame as the ESPR project would increase short-term air pollutant emissions during the construction activities. CEC comments on appropriate EIRs could provide for the minimization of construction impacts by the use of CEC preferred mitigation devices such as soot filters, etc. Any additional construction activities occurring during this time in the vicinity of Los Angeles International Airport would increase emissions beyond already significant levels. However, it is difficult to determine the exact impact from construction emissions given the uncertainty regarding the timing and phasing of these projects. Cumulative emissions from construction activities, in conjunction with those associated with future probable future projects at Los Angeles International Airport, would be significant and unavoidable.

Cumulative socioeconomic impacts associated with the construction of the projects could potentially occur from overlapping construction schedules. Concurrent construction of the projects could temporarily deplete certain types of trade labor and equipment. However, these impacts are not considered significant since there is a large supply of construction workers/laborers within the Los Angeles County.

# **5.20.3** Stipulated Conditions of Certification

No Stipulated Conditions of Certification apply to the issue area of Cumulative Impacts.

# **5.20.4** Mitigation Measures

No mitigation measures are proposed for the issue area of Cumulative Impacts.

# 5.20.5 Applicable Laws, Ordinances, Regulations, and Standards

No LORS apply to the issue area of Cumulative Impacts.

TABLE 5.20-2
LORS APPLICABLE TO CUMULATIVE IMPACTS

		Conformance
LORS	Applicability	(section)
Federal		
	No Federal LORS apply	
State		
	No State LORS apply	
Local		
	No local LORS apply	

# 5.20.5.1 Agencies and Agency Contacts

No agencies or agency contacts are applicable to the issue of cumulative impacts (See Table 5.2-3).

#### **TABLE 5.20-3**

#### **AGENCY CONTACTS**

Agency	Contact	Title	Telephone
	No agency contacts	s apply	

## 5.2 0.5.5 **Applicable Permits**

No permits are required for this issue of area (See Table 5.2-4).

#### **TABLE 5.20-4**

#### APPLICABLE PERMITS

Jurisdiction	Potential Permit Requirements	
Federal	No Federal permits apply	
State	No State permits apply	
Local	No local permits apply	

#### 5.20.4 References

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